

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

July 7, 2025

VIA ECF

United States District Court

District of New Jersey

Attn: Hon. Elizabeth A. Pascal, U.S.M.J.

4th & Cooper Streets

Camden, NJ 08101

**Re: Johnson, Sinowa v. NJ TRANSIT, et al.,
Case No.: 1:25-cv-02528 (KMW) (EAP)**

Dear Judge Pascal:

This firm represents Plaintiff Sinowa Johnson (hereinafter the “Plaintiff”) in the above-referenced case. Pursuant to Local Civil Rule 6.1 of the District of New Jersey, Plaintiff respectfully submits this letter to request an adjournment of the Initial Conference currently scheduled to proceed via telephone on Wednesday, July 9, 2025, at 11:00 A.M.

Plaintiff’s counsel, Emanuel Kataev, Esq., is scheduled to appear at a hearing on an Order to Show Cause in an unrelated trade secrets litigation matter before the Honorable Lewis J. Liman, U.S.D.J., in the Southern District of New York at 10:30 A.M. on the same date, and will therefore be unable to attend the Initial Conference at the currently scheduled time.

Accordingly, Plaintiff respectfully requests that the Court adjourn the Initial Conference and reschedule it for a later date convenient to the Court.

We have conferred with opposing counsels, who have consented to the adjournment and indicated the following dates of availability: July 15–18, and July 22, 24, and 29, 2025. We respectfully request that the Court reschedule the Initial Conference for a later date convenient to the Court and within that range.

We thank the Court for its attention to this matter and for its consideration of this request.

Dated: Jamaica, New York
July 7, 2025

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)

(718) 489-4155 (facsimile)
emanuel@sagelegal.nyc

*Attorneys for Plaintiff
Sinowa Johnson*

VIA ECF

/s/ Travis M. Anderson

Travis M. Anderson, Esq.
CRUSER, MITCHELL, NOVITZ,
SANCHEZ, GASTON, & ZIMET, LLP
50 Tice Boulevard, Suite 250
Woodcliff Lake, New Jersey 07677
T: (201) 474-7100
F: (201) 474-7101
E: dsanchez@cmlawfirm.com

*Attorneys for Defendant
NJ Transit Bus
Operations Inc.*

/s/ Paul A. Montalbano

Paul A. Montalbano
COHEN, LEDER, MONTALBANO & CONNAUGHTON, LLC
669 River Drive, Suite 125
Elmwood Park, New Jersey 07407
T: (908) 298-8800
E: montalbanoemail@yahoo.com

*Attorneys for Defendant
ATU Local 880*